

John C. Bugher, M.D., Director Division of Tiology and Medicine February 11, 1954

Gordon M. Tunning, Mealth Physiciat Prophysics Franch, Tivision of Miology and Medicine

COMMENTS ON CO. ALVER GRAVEDY LUCTED

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The ideas in 'r. Graves' letter have been discussed before but may I make three salient points:

1. Dr. Craves quotes from your letter, "... believe that one fundamental matter which is forgotten in discussing test operations is that while we may knowingly and with justification expose a member of the operational team to a real hazard, we are not in a position to do that to the off-site public", and then proceeds with several logical statements and assertions to which one might agree entirely but which are rather irrelevant to the principal point of the quotation. I suspect, without knowing what is in Dr. Craves' mind, of course, that the point that led him to write as he did was the phrase "... which is forgotten". Perhaps a compromise phrase "... which must be constantly held in mind ... " minut eliminate the disagreement.

2. Reference is made to par. 2 of Pr. Graves' letter where he would stop the interration of doses when the dose rate became equal or less than 0.3 r/wk.

By this method we would be left with the problem of explaining to the law public the meaning and significance of the "extra" doses over and beyond the 0.3 r/wk that occurred up to the time where the dose rate had dropped to this point and of defending the ADC's position in permitting the general population to be subjected to this "extra" quantity. Thimhation of the objectionable word "overexposure" will not solve this problem.

There is some scientific basis and precedent for integrating over periods of time in the order of 10-15 weeks. This is not so true for the method fr. Graves proposes.

Lastly, through usage and education there has been some degree of acceptance on the part of the general public for an integrated figure of 3.9 r. To change to Dr. Graves' proposal would require re-education, with possible weakening of the public's confidence in ATC standards.

3. Reference is made to the last paragraph of Fr. Graves' letter. After the discussions that took place during the Feasibility Committee

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meeting on January 20th, perhaps Tr. Graves has a clearer picture of the differences in setting criteria for maximum permissible exposures to large general populations versus relatively small numbers of test personnel, and also might not now support his recommendation of statements referring to "threshold tolerance".

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